



AmericanCoatings

ASSOCIATIONSM

November 12, 2017

Ingrid Feustel
Chemical Control Division
Office of Pollution Prevention and Toxics (OPPT)
Environmental Protection Agency
1200 Pennsylvania Ave. NW.
Washington, DC 20460-0001

RE: ACA Comments on Methylene Chloride in Furniture Refinishing Docket # EPA-HQ-OPPT-2017-0139

Dear Ms. Feustel,

The American Coatings Association (“ACA”) appreciates the opportunity to provide comments to the U.S. Environmental Protection Agency (“EPA” or “Agency”) in response to the September 12th Workshop regarding Methylene Chloride in Commercial Furniture Refinishing.

ACA is a voluntary, non-profit trade association working to advance the needs of the paint and coatings industry and the professionals who work in it. The organization represents paint and coatings manufacturers, raw materials suppliers, distributors, and technical professionals. ACA serves as an advocate and ally for members on legislative, regulatory and judicial issues, and provides forums for the advancement and promotion of the industry through educational and professional development services.

ACA’s membership represents over 90% of the total domestic production of paints and coatings in the country. In addition, ACA represents companies that manufacture and distribute MeCl₂ Paint Strippers and Removers that are specifically formulated for commercial furniture refinishing, and thus are extremely interested in this information gathering exercise.

ACA Responses to EPA’s Workshop

One aspect of commercial furniture stripping that we believe is continually overlooked by the Agency is that it is often done by small business persons and contractors who purchase products at retail from big box distributors such as Home Depot, Lowes, Walmart, etc. These stripping products are often packaged in small containers. Smaller containers have many advantages for the industry: they not only make the stripping products safer to transport, but are also easier to use. Additionally, because commercial refinishers can purchase only the amount that they need, they end up producing less waste than large containers.

EPA’s current approach in the proposed paint stripping rule prohibits the size of containers that are sold at retail; which effectively bans all consumer-use stripping products. ACA believes that if EPA takes the same approach to furniture strippers generally, the Agency will crush the retail stripping product

market, ultimately harming small business enterprises who rely on retailers and the availability of such small volume, even single-use small containers.

When EPA attempts to restrict or phase-out the most effective and fast-acting solvent-based stripping product formulations (i.e., those containing Methylene Chloride), alternative products with less well known hazard profiles will become more prevalent in the market. These risks include increased flammability and variety of other safety hazards, and could potentially affect both commercial and consumer users. Additionally, the use of less effective stripping product formulations would also substantially increase the duration of exposure, since these new formulations of stripping products often take longer to use and can require more frequent applications.

As we stated in our earlier comments (submitted 5/13/2017; EPA-HQ-OPPT-2016-0231-0001), ACA strongly believes that alternative ways of controlling risks exist and should be considered by the Agency. Risk mitigation can be achieved by establishing a uniform set of multi-lingual labeling requirements and pictograms which clearly restrict use of stripping products in enclosed or small spaces, such as bath tubs and showers, and for extended periods of time.

Conclusion

In conclusion, ACA believes that EPA's current tactic of prohibiting smaller containers at retail stores will have a strong negative impact on the commercial refinishing industry. In addition, the use of methylene chloride alternatives have not been adequately vetted for their hazards or effectiveness, and we believe that they can potentially have an even more detrimental effect on human health and the environment, especially due to increased duration of exposure. And finally, we would like to reiterate our comments that were made previously regarding the use of labeling and directions as an effective method of risk mitigation.

We appreciate the opportunity to provide our comments on the use of Methylene Chloride in Commercial Furniture Refinishing. We look forward to working with you through out this process.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Davis', with a stylized flourish extending from the end.

Raleigh Davis
Assistant Director, Environmental Health and Safety